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March 17, 2025

Hon. Louis L. Stanton
U.S. Courthouse
500 Pearl Street
New York, NY 10007

FILED VIA CM/ECF

Re: ***Apollo Healthcare Corp. v. Sol de Janeiro USA Inc., et al***, No. 1:22-cv-07719-LLS

Dear Honorable Judge Stanton:

This law firm represents Apollo Healthcare Corp. d/b/a Apollo Health and Beauty Care and Costco Wholesale Corp. (“Costco”) (collectively, “Apollo”) in the above-referenced matter. Pursuant to Your Honor’s Individual Rules of Practice in Civil Cases Rule 3.B (“Rule 3.B”), we write to respectfully request that Your Honor issue an order allowing Apollo to file three spreadsheets and 12 videos in the traditional manner in the form of a flash drive rather than through the ECF system. These spreadsheets and videos are being filed as exhibits to the Declaration of Tiffany Blofield in Support of Apollo’s Proposed Findings of Fact, Declaration of Tiffany Blofield in Support of Apollo’s Motions in Limine and Declaration of Craig Krummen in Support of Apollo’s Trial Brief.

“Any party unable to comply with the requirement for electronic filing . . . through the ECF system . . . must move for leave of the Court to file in the traditional manner . . .” Rule 3.B. Apollo seeks to file three spreadsheets and 12 videos in the traditional manner.

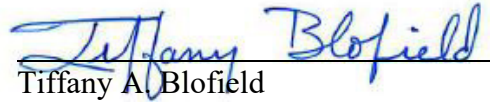
In connection with Apollo’s Proposed Findings of Fact, Apollo will be referencing two Apollo produced Excel spreadsheets. Both spreadsheets contain numerous tabs of various financial information. We will also be referencing numerous videos. In connection with Apollo’s Trial Brief, we will be referencing one video and in connection with our Motions in Limine, we will be referencing a Costco produced Excel spreadsheet. The spreadsheets contain a substantial amount of information. Apollo is unable to print these spreadsheets in a format that could be filed in the ECF system or would be readable for Your Honor. We are also unable to upload the videos into the ECF system. Accordingly, we will need to file these spreadsheets and videos traditionally on a flash drive and provide Your Honor with a flash drive along with the courtesy paper copies of the other filings.

Apollo hereby requests permission to allow us to file these three (3) spreadsheets in native format along with the 12 videos on a flash drive which will allow Your Honor to search for information and magnify the very small text.

We thank Your Honor for your time and attention to this matter.

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Respectfully submitted,


Tiffany A. Blofield

*Attorney for Apollo Healthcare Corp. d/b/a Apollo
Health and Beauty Care and Costco Wholesale
Corp.*

Enclosures

cc: All Counsel of Record